

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RICHARD NOWAK and LUCINDA L. WILLIAMS	:	C.A. NO.: 1:08-cv-379
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
DAVID M. BORTLE, JR and AUDREY ROSENBALM	:	JURY OF 12 DEMANDED
	:	
	:	
Defendants.	:	

**REQUEST FOR PRODUCTION DIRECTED
TO PLAINTIFF RICHARD NOWAK**

Defendants request the plaintiff to produce for examination and copying at the office of the attorney for the defendant on or before thirty (30) days from the date of receipt of this request, the following items:

1. All hospital records, doctors' summaries and reports, reports concerning any physical tests performed on or concerning the injured plaintiff and any other matter in writing prepared by or on behalf of any person trained in the healing arts concerning the injured plaintiff's past, present, or future physical condition insofar as such matters in writing may be in the possession, custody or control of the plaintiff or available to the plaintiff, plaintiff's insurer, or plaintiff's attorney upon request by him to any doctor, hospital or other person.

RESPONSE:

2. Copies of all statements, bills or canceled checks showing the amount charged for services rendered to the injured plaintiff or items sold to the plaintiff in connection with the care of the injured plaintiff's alleged injuries.

RESPONSE:

3. Copies of all photographs, sketches, diagrams or other drawings taken by, or prepared by you, or on your behalf, or in your possession, or available to you, concerning any aspect of the litigation.

RESPONSE:

4. Copies of Federal Income Tax Returns of the plaintiff for the years 2003 through 2007.

RESPONSE:

5. Copies of all statements or summaries of interviews taken of any person with respect to any issue in the case, including, but not limited to the plaintiff or his agents and the defendant or the defendant's agents.

RESPONSE:

6. Copies of all reports of investigation, findings of fact, observation of facts or circumstances or any other matter relating to any aspect of the litigation.

RESPONSE:

7. Any reports by any person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.

RESPONSE:

8. Insofar as any insurer, including, but not limited to workmen's compensation insurers or automobile PIP coverage insurers, may have reports, records or the like, which are available to the plaintiff upon request, then copies of such reports and records.

RESPONSE:

9. Any other relevant documents available to you and relied upon or mentioned in your responses to discovery.

RESPONSE:

BIFFERATO GENTILOTTI LLC

/s/ Maria J. Poehner

MARIA J. POEHNER, Esquire (3213)

800 N. King Street

P.O. Box 2165

Wilmington, DE 19899-2165

(302) 429-1900

Attorney for Defendants

Date: August 21, 2008

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FOR THE DISTRICT OF DELAWARE**

RICHARD NOWAK and LUCINDA L.	:	C.A. NO.: 1:08-cv-379
WILLIAMS	:	
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Plaintiffs,	:	
	:	
v.	:	
	:	
DAVID M. BORTLE, JR and AUDREY	:	JURY OF 12 DEMANDED
ROSENBALM	:	
	:	
Defendants.	:	

NOTICE OF SERVICE

PLEASE TAKE NOTICE that on this 21st day of August, 2008, the undersigned has caused to be served a true and correct copy of Interrogatories and Request for Production Directed to Plaintiff Richard Nowak to be delivered via Electronic Filing on the following:

Cynthia H. Pruitt, Esquire
Doroshow, Pasquale, Krawitz & Bhaya
1202 Kirkwood Highway
Wilmington, DE 19805-2120

BIFFERATO GENTILOTTI LLC

/s/ Maria J. Poehner
Maria J. Poehner, Esquire (Del. I.D. #3213)
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P.O. Box 2165
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Attorney for Defendants